REMARKS

Claims 14-22 and 26-48 are currently pending in the subject application and are presently under consideration. All pending claims are found at pages 2-12. Claims 22, 32, 33 and 37 have been amended herein for clarification purposes. New claims 38-48 have been added herein to emphasize various novel aspects of the subject invention. These claims do not raise any new issues requiring additional search and/or undue consideration over that of the originally filed claims. Accordingly, entry and consideration thereof is respectfully requested, and further, favorable consideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I.   Rejection of Claim 22 Under 35 U.S.C. §112

Claim 22 stands rejected under 35 U.S.C. §112, second paragraph, for failing to particularly point out and distinctly claim the subject matter which the applicant regards as his invention. It is respectfully submitted that this rejection should be withdrawn for at least the following reason. Claim 22 is herein amended to cure such informalities and accordingly, withdrawal of this rejection is respectfully requested.

II.   Rejection of Claims 14-22 and 26-37 Under 35 U.S.C. §102(e)

Claims 14-22 and 26-37 stand rejected under 35 U.S.C. §102(e) as being anticipated by Peterson et al. (U.S. Patent No. 5,801,687). It is respectfully requested that this rejection should be withdrawn for at least the following reason. Peterson et al. does not disclose, teach nor suggest, each and every element of the subject claim.

> A single prior art reference anticipates a patent claim only if it expressly or inherently describes each and every limitation set forth in the patent claim. *Trintec Industries, Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292, 63 USPQ2d 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the ... claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

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Independent claim 14 (and similarly independent claims 22, 26, 29, 32, 33 and 37) recites *a compiler for compiling the specification which results in a user interface output controller distinct from the application program*, and a *compiled user interface output controller*. In particular, the subject invention relates to a method and system for generating user-interface output sequences wherein an application program that may wish to communicate with a user is relieved of the necessity of generating user interface output sequences by a compiled user interface output controller distinct from the application itself. Peterson *et al.* does not disclose, teach or suggest limitations as recited in the subject claims. Rather, Peterson *et al.* relates to an authoring tool application comprising nested state machines for use in a computer system; the nested state machines do not have an existence separate from the application. Consequently, Paterson *et al.* does not disclose a user interface output controller distinct from the application program.

Further, nowhere in Peterson *et al.* is a *distinct compiled user interface output controller* disclosed, taught or suggested as recited in the subject claims. Applicants' claimed invention, on the other hand, generates and maintains a compiled user interface output controller distinct from the underlying application program. The compiled user interface output controller relieves the application program of the task of generating, maintaining, monitoring and controlling the low-level tasks associated with user interface output sequences. Without the user interface output controller component, the application itself would have to generate, maintain, monitor and control these user interface output control sequences causing degradation in application performance.

Moreover, Peterson *et al.* does not disclose teach nor suggest a compilation means for converting a specification into a distinct compiled user interface output controller. Applicants' claimed invention provides the facility to convert a user-derived specification into a compiled user interface output controller distinct for the application itself. Thus, Peterson *et al.* does not disclose, teach nor suggest, *a compiler for compiling the specification which results in a user interface output controller distinct from the application program*, and a *compiled user interface output controller* as recited in the subject claims.

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In view of at least the foregoing, it is submitted that Peterson *et al.* does not anticipate the present invention. Accordingly, it is respectfully requested that the rejection with respect to independent claims 14, 22, 26, 29, 32, 33 and 37, together with their respective dependent claims, should be withdrawn.

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CONCLUSION

The present application is believed to be condition for allowance in view of the above amendments and comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

AMIN & TUROCY, LLP
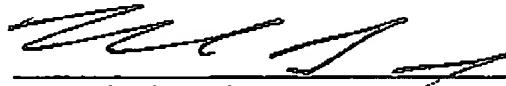
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